

Saint Benedict Press, LLC – Privilege Log – June 26, 2018

Bates Stamped Number	Document Date	Type of Document	Person in Possession of the Document	Author of the Document	Reason for Not Producing
SBPP-00219	01/03/1974	Letter	Natalie D. Potter	Michael F. Roberts The Mercier Press Limited	Redaction of handwritten note made by Conor Gallagher – attorney/client privilege, created in anticipation of litigation, attorney work product.
SBPP-00220	05/12/1973	Letter	Natalie D. Potter	Thomas A. Nelson	Redaction of handwritten note made by Conor Gallagher – attorney/client privilege, created in anticipation of litigation, attorney work product.
SBPP-00221	11/29/1973	Letter	Natalie D. Potter	Michael F. Robert The Mercier Press Limited	Redaction of handwritten note made by Conor Gallagher – attorney/client privilege, created in anticipation of litigation, attorney work product.
SBPP-00222	09/28/1973	Letter	Natalie D. Potter	Thomas A. Nelson	Redaction of handwritten note made by Conor Gallagher – attorney/client privilege, created in anticipation of litigation, attorney work product

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SBPP-00242	Undated	Bookcover	Natalie D. Potter	Dr. Ludwig Ott	Redaction of handwritten note made by Conor Gallagher – attorney/client privilege, created in anticipation of litigation, attorney work product.
SBPP-00245	09/16/1974	Letter	Natalie D. Potter	Thomas A. Nelson	Redaction of handwritten note made by Conor Gallagher – attorney/client privilege, created in anticipation of litigation, attorney work product.
SBPP-00271	07/18/2011	Email	Natalie D. Potter, Jonathan Buchan	Brent Klaske	Redaction of email header– attorney/client privilege
SBPP-00278	02/05/2014	Email	Natalie D. Potter, Jonathan Buchan	Kathy Anderson	Redaction of email header– attorney/client privilege
SBP- 02250-02253	Various	Spreadsheet – Redaction of certain customer names	Natalie D. Potter, Jonathan Buchan	Defendant	Confidential Proprietary Information
SBPP-00289-00290		Screenshot of software used to track orders with handwritten notes regarding the same.	Natalie D. Potter	Natalie D. Potter	Attorney/client privilege, attorney work product, created in anticipation of litigation or for trial.

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N/A	Various	Timelines created by counsel	Natalie D. Potter, Jonathan Buchan, Defendant	Natalie D. Potter	Attorney/client privilege, attorney work product, created in anticipation of litigation or for trial.
N/A	Various	Various Emails, Memorandums, to and from client, and to insurance carrier representative	Natalie D. Potter, Jonathan Buchan, Defendant's insurance carrier Hiscox	Jonathan Buchan & Natalie D. Potter, Conor Gallagher	Attorney/client privilege, attorney work product, created in anticipation of litigation or for trial.
N/A	Various	Emails regarding case strategy and evaluation and related issues	Natalie D. Potter, Jonathan Buchan, Defendant	Jonathan Buchan & Natalie D. Potter and Conor Gallagher, Bob Gallagher, Rick Rotondi, Mara Persic and other representatives of Defendant.	Attorney/client privilege, attorney work product.
N/A	Various	Emails and attorney notes regarding responding to Plaintiff's discovery requests	Natalie D. Potter, Jonathan Buchan, Defendant	Jonathan Buchan & Natalie D. Potter and Conor Gallagher, Bob Gallagher, Rick Rotondi, Mara Persic and other representatives of Defendant.	Attorney/client privilege, attorney work product, created in anticipation of litigation or for trial.
N/A	January 8, 2013	Emails regarding researching Plaintiff's claims	Natalie D. Potter, Jonathan Buchan, Defendant	Employee of Defendant and Sharon O'Donovan	Created in anticipation of litigation or for trial.

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N/A	January 7, 2014 to January 21, 2014	Emails between Defendant's employee and Francesca Bressan regarding researching Plaintiff's claims	Natalie D. Potter, Defendant	Employee of Defendant & Francesca Bressan	Created in anticipation of litigation or trial.
N/A	November 8, 2017	Emails between current employee of client and former employee of client regarding evaluating Plaintiff's claims	Natalie D. Potter, Jonathan Buchan, Defendant	Mara Persic & Mary Lester	Created in anticipation of litigation or for trial.
N/A	Various	Print offs from various websites regarding research conducted by Defendant's employees in evaluation of Plaintiff's claims	Natalie D. Potter, Jonathan Buchan, Defendant	Defendant	Created in anticipation of litigation or for trial.

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N/A	Various	Emails, notes, correspondence, and other similar documents	Conor Gallagher, John Nipp, Esq., Jonathan Buchan, Natalie D. Potter	Conor Gallagher, John Nipp, Esq.	Attorney client privilege/ Attorney work product, created in anticipation of litigation of for trial.  Mr. Nipp consulted with Defendant regarding the case.
N/A	Various	Emails, notes, correspondence, and other documents	Conor Gallagher, Ryan Monk, Esq.	Conor Gallagher, Ryan Monk, Esq.	Attorney client privilege/ Attorney work product, created in anticipation of litigation of for trial.  Mr. Monk consulted with Defendant regarding the case.
N/A	?	Possible emails, and notes regarding a conversation between Conor Gallagher and Marshall Leaffer, Esq. regarding Plaintiff's claims	Conor Gallagher, Marshall Leaffer, Esq.	Conor Gallagher, Marshall Leaffer, Esq.	Attorney client privilege/ Attorney work product, created in anticipation of litigation of for trial.  To date Mr. Gallagher has been unable to locate correspondence with attorney Leaffer and is unsure if such correspondence exists at this time as the consultation may have taken place only over the phone.
SBP-02298-02317	Various	Royalty Reports	Natalie D. Potter, Jonathan Buchan, Defendant	Defendant's certified public accountant	Redacted titles not at issue in this case.

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N/A	Various	Emails, correspondence, notes and other items relating to Defendant's acquisition of TAN	Defendant Paula K Jacobi, Esq. Barnes & Thornburg LLP, who represented Defendant in the acquisition.	Paula K Jacobi, Esq. and the firm Barnes & Thornburg LLP	Attorney client privilege, attorney work product.